

June 21, 2005

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Office of Nutritional Products  
Labeling and Dietary Supplements (HFS-810)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Pkwy  
College Park, MD 20740

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Re: Notification for Statements of "Nutritional Support" on Dietary Supplements

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act, this letter (original and two copies) serves as notification the Natrol, Inc., located at 21411 Prairie Street, Chatsworth, CA, 91311, proposes to make statements of "nutritional support" for the following dietary supplement products:

Product Name	Statement(s) of Nutritional Support	Ingredients
brainSpeed Perform™	<ul style="list-style-type: none"> <li>Helps improve decision making</li> <li>Helps increase work productivity</li> <li>Think faster!</li> <li>Helps improve cognitive processing speed and maximize mental performance. Specifically formulated to help increase work productivity, help offset mental fatigue, and improve your decision-making speed.</li> <li>Features a clinically tested formula – the brainSpeed blend™ -- to help improve brain processing speed for the duration of product consumption, along with rhodiola to help support increased mental productivity and work performance.</li> </ul>	Thiamin, Niacin, Pantothenic Acid, Toothed Clubmoss Extract, Dimethylaminoethanol, Rhodiola Root Extract
brainSpeed Attention™	<ul style="list-style-type: none"> <li>Helps promote attention</li> <li>Helps enhance alertness</li> <li>Think faster!</li> <li>Helps improve cognitive processing speed and promote attention. Specifically formulated to help promote an alert mental state and improve your decision making speed.</li> <li>Features a clinically tested formula – the brainSpeed blend™ -- to help improve brain processing speed for the duration of product consumption, along with theanine to help you relax and concentrate as your attend to demanding mental tasks.</li> </ul>	Thiamin, Niacin, Pantothenic Acid, Toothed Clubmoss Extract, Dimethylaminoethanol, Theanine

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Nourishing the Potential of Mind and Body for 25 Years  
1980 2005

Product Name	Statement(s) of Nutritional Support	Ingredients
brainSpeed Memory™	<ul style="list-style-type: none"><li>• Helps maintain memory</li><li>• Helps promote recall</li><li>• Think faster!</li><li>• Helps improve cognitive processing speed, promote recall and maintain memory. Specifically formulated to help support mild memory problems associated with aging.</li><li>• Features a clinically tested formula – the brainSpeed blend™ -- to help improve brain processing speed for the duration of product consumption, along with key B vitamins – folic acid, vitamin B6 and vitamin B12 – to support optimal memory.</li></ul>	Thiamin, Niacin, Pantothenic Acid, Vitamin B6, Vitamin B12, Folic Acid, Toothed Clubmoss Extract, Dimethylaminoethanol, Phosphatidylserine

Please be advised that the label of each of the above dietary supplement products prominently displays the statement that "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent disease."

I certify that the information contained in this notice is complete and accurate and that Natrol possesses substantiation that these statements are truthful and not misleading.

Sincerely,  
NATROL, INC.

  
Kathleen Dunn, MPH, RD  
Senior Compliance Manager